

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

DR. BRIMA SYLLA, CONNOR SPENCE,
DAVID-DESYRÉE SHERWOOD,
KATHLEEN COLE, SULTANA HOSSAIN,
TRISTIAN MARTINEZ, JUSTINE
MEDINA, BRETT DANIELS, RUEL
MOHAN, ROB MCDONALD, PASQUALE
CIOFFI, SAM BOWMAN, JOE
LUCCHESI, ROBERT PECORARO,
YACKISHA NEBOT-LOPEZ, AIDE
ESTUDILLO, BRIANA ANDERSON,
NAQUASIA ROWLAND, TAMIA
CAMPBELL, JENNIFER SCHOFIELD,
MICHAEL RIVERA, CHRISTIAN
MOHANSINGH, JAMES BARDO,
ABDULA DIALLO, IBRAHIM BALDE,
FELICIA REESE, IGOR MABIKA,
MICHAEL LOPEZ, NICHOLAS
FERRUGIARO, ABDULLAH SESAY,
KAREEM LINDSAY, LILLIAN LOPEZ,
TREMAYNE YOUNGBLOOD, ALI GIGNI,
MANNY THOMPSON, RJEEN
RODRIGUEZ, SIMONE SUE, LATIFAH X,
COMRAD BROWN, JORDAN SILVEIRA,
RICHARD COTTO, DEYANIRIS MOTE,
JESSICA EDMONDS, KIMBERLY
MERISE, BIANCA BUTLER, MICHAEL
ANTONIO, MARK JOHNSON, CRAIG
AYALA, JOHN PHILIP, LASALLE DELLA
ROCA, CHRIS KOKO, CHRISTINA
JIMMY, CHARLES JOHNSON, CHRIS
PHILIP, AHMED BOBACAR, CATY
RIDREGO, DURVIS SAINT LUIS, KEVIN
BERTMAN, AALIYA DIAMOND,
MOHAMED AWES, ALI DAWUD, FRED
FIBIO, ISMAEL MENDOZA, BRIANA
PACHECO, JAYSHAWN BAZEMORE,
AMANI CLAUDIA, CHRISTOPHER
WHRIGHT, EZEKIEO BENSON, ETHAN
COPER, JOSEPH DEJESUS, ISOLA
OKUNU, ARIANA JOHNSON, MOSTEP
STEP, ABAYOMI "BAYOU" ABIMBOLA,
GABRIEL WEBBS, ALIYYAN AZIZ,

Civil Case No. 23-5261 (AMD)(TAM)

EMMANUEL JEAN, ANTOINETTE
GRAY, DON ELIJAH, ERIC HARRIS,
RONDU JOHN, NICOLE FLORES,
MERLDON GUSTAVE, MOHAMED
GACK, JOE JOHNSON, and ADRIAN
JOHN,

Plaintiffs,

-against-

AMAZON LABOR UNION, and CHRIS
SMALLS, as President of the Amazon Labor
Union,

Defendants.

DECLARATION OF PATRICK L. ROBSON

I, Patrick L. Robson, declare as follows:

1. I am an attorney with the law firm Hunton Andrews Kurth LLP, which represents Non-Parties Amazon.com Services LLC and Raymond Roach in the above-captioned action (this “Action”). I respectfully submit this affirmation in Opposition To Plaintiffs’ Motion For An All Writs Act Order And In Support Of Amazon.com Services LLC and Raymond Roach’s Motion To Quash And For A Protective Order. I have personal knowledge of the facts set forth herein.

2. Attached hereto as Exhibit A is a true and correct copy of the subpoena served by Defendants on Raymond Roach on April 2, 2024.

3. Attached hereto as Exhibit B is a true and correct copy of the Petition filed by the Amazon Labor Union (“ALU”) with the National Labor Relations Board (“NLRB”) on December 22, 2021.

4. Attached hereto as Exhibit C is a true and correct copy of the January 11, 2023 Decision And Certification Of Representative issued by Cornele A. Overstreet, Regional Director, National Labor Relations Board, Region 28.

5. Attached hereto as Exhibit D is a true and correct copy of Non-Parties Ray Roach and Amazon.com Services LLC's Objections To Defendants' Subpoena Pursuant To Rule 45 for the Production of Documents served on Defendants' counsel on April 22, 2024.

6. Attached hereto as Exhibit E is a true and correct copy of an email from Jeanne Mirer to Kurt Larkin dated January 13, 2023.

7. Attached hereto as Exhibit F is a true and correct copy of an email from Jeanne Mirer to Kurt Larkin, Retu Singla, Ria Julien, and Eric Milner, dated September 2, 2022.

8. Attached hereto as Exhibit G is a true and correct copy of the NLRB Charge Against Employer, dated April 4, 2024.

9. Attached hereto as Exhibit H is a compilation of copies of postings to X.com (formerly Twitter.com) and Instagram.com:

- a. X.com post by the ALU Democratic Reform Caucus (@ReformALU), (April 3, 2024), available at <https://twitter.com/ReformALU/status/1775552517742460963>;
- b. X.com post by Christian Smalls (@shut_downamazon), (Feb. 20, 2024), available at https://x.com/Shut_downAmazon/status/1759977467031261557;
- c. Instagram.com post by the ALU Democratic Reform Caucus (reform_alu), (Oct. 6, 2023), available at https://www.instagram.com/p/CyFUOBXAKRB/?img_index=1;

- d. X.com post by Christian Smalls (@shut_downamazon), (July 28, 2023),
available at

https://twitter.com/Shut_downAmazon/status/1684977611150438400.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 30, 2024
New York, New York

/s/ Patrick L. Robson
Patrick L. Robson

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of April, 2024, I electronically filed the foregoing document with the United States District Court for the Eastern District of New York through the Court's CM/ECF system, which sent notification of such filing to the attorneys of record.

/s/ Patrick L. Robson
Patrick L. Robson